

### **REMARKS**

Claims 1-17 are pending in this application. Claims 1-11 and 13-17 are amended herein. Support for the amendments to the claims may be found in the claims as originally filed, in Fig. 3, and in the specification at page 21, lines 23, 24, 25, continuing at page 22, line 1-4. Reconsideration is requested based on the foregoing amendment and the following remarks.

#### **Response to Arguments:**

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive. The final Office Action asserts in section 4A, at pages 7 and 8, that:

Nobakht teaches an Internet appliance user management system such as system server 110 is connected to the Internet [see Fig. 1] which is connected to an IA terminal such as user terminal 130A-D via a network, comprising an IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection. For example, Nobakht discloses storing user/terminal information such as userID, user PIN, terminal ID, manufacture date, etc.

This is submitted to not be quite correct. The only number or mark of a manufacturer described in Nobakht identifies the set-top box 131, not the user terminal 131-A, and it is stored in asset manager flash 222. Asset manager flash 222, moreover, which stores information that identifies set-top box 131, such as serial number 342 and manufacture date 344, is part of the set-top box 131 of Nobakht, not the system server 110, as shown in Figs. 1 and 2. In particular, as described at column 7, lines 18-23:

FIG. 3(C) is a block diagram illustrating an example of the data stored in asset manager flash 222. Asset manager flash 222 is a non-volatile memory that is permanently connected to internal bus 230. Asset manager flash 222 permanently stores information that identifies set-top box 131, such as serial number 342 and manufacture date 344.

Since, in Nobakht, the information that identifies set-top box 131, such as serial number 342 and manufacture date 344, is part of the set-top box 131 of Nobakht, not the system server 110, Nobakht has no "IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service

information including the kind of service to be received," as recited in, for example, claim 1.

Asset manager flash 222, moreover, also stores current channel table version information 344 for each user in the customer group associated with set-top box 131. In particular, as described at column 7, lines 24, 25, and 26:

Asset manager flash 222 also stores current channel table version information 344 for each user in the customer group associated with set-top box 131.

Since, in Nobakht, also stores current channel table version information 344 for each user in the customer group associated with set-top box 131, Nobakht has no "IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received," as recited in, for example, claim 1.

Still, in the interests of compact prosecution only, and not for any reason of patentability, the claims have been amended to recite, inter alia an "Internet appliance (IA) terminal user management device," rather than "Internet appliance (IA) terminal user management system," and "a transmission and receiving unit transmitting and receiving the user registration information to and from the IA terminal," rather than "a transmission and receiving unit on the side of the IA terminal user management system, transmitting and receiving the user registration information to and from the IA terminal," to differentiate processing on the terminal side, as in Nobakht, from processing on the device, i.e. server, side, as in the claimed invention.

The final Office Action asserts further in section 4A, at page 8, that:

Nobakht further teaches a transmission and receiving unit on the side of the IA terminal user management system, transmitting and receiving the user registration information to and from the IA terminal, and requests the IA terminal to input the user registration information.

Since, as noted in the Office Action, the IA terminal inputs the user registration information in Nobakht, Nobakht has no "Internet appliance (IA) terminal user management device," or "a transmission and receiving unit transmitting and receiving the user registration information to and from the IA terminal," as now recited in, for example, claim 1. Nobakht, rather, performs processing on the terminal side, as opposed to the device, i.e. server, side, as in the claimed invention.

Claims 9, 13, and 16, furthermore, have been amended to recite "the IA terminal user

management device judges whether or not the user registration information for the device has been written to the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device."

Further reconsideration is thus requested.

**Claim Rejections - 35 U.S.C. § 102:**

Claims 1-16 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,269,445 to Nobakht et al. (hereinafter "Nobakht"). The rejection is traversed to the extent it would apply to the claims as amended. Reconsideration is earnestly solicited.

The preamble and second clause of claim 1 recites:

An Internet appliance (IA) terminal user management device . . . comprising an IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection.

Nobakht neither teaches, discloses, nor suggests "an Internet appliance (IA) terminal user management device . . . comprising an IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection," as recited in claim 1. In Nobakht, rather, the data is processed on the terminal side, as discussed above, not the device side. In particular, as described at column 1, lines 66 and 67, continuing at column 2, lines 1-4:

When a channel number is entered, the user terminal retrieves the associated Internet address (e.g., URL) from the downloaded channel table, and connects the terminal to the selected Internet site.

Since, in Nobakht, the user terminal retrieves the associated Internet address (e.g., URL) from the downloaded channel table and connects the terminal to the selected Internet site when a channel number is entered, the data is processed on the terminal side in Nobakht, rather than the device side, and Nobakht has no "Internet appliance (IA) terminal user management device .

. . comprising: an IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection," as recited in claim 1.

Each user terminal 130-A through 130-D in Nobakht, moreover, includes circuitry for connecting the user terminal to a selected Internet site 120-1 through 120-4. In particular, as described at column 3, lines 43-50:

Each user terminal 130-A through 130-D includes circuitry for downloading and storing channel table data downloaded from server 110, displaying the channel numbers and Internet site names from the downloaded channel table data, allowing a user to enter selected channel numbers, and connecting the user terminal to a selected Internet site 120-1 through 120-4 that is associated with the selected channel number.

Since user terminal 130-A through 130-D in Nobakht includes circuitry for connecting the user terminal to a selected Internet site 120-1 through 120-4, the data is processed on the terminal side in Nobakht, rather than the device side, and Nobakht has no "Internet appliance (IA) terminal user management device . . . comprising: an IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection," as recited in claim 1.

The CPU of set-top box 131 in Nobakht, moreover, connects user terminal 130-A to a selected Internet site. In particular, as described at column 4, lines 9-16:

In response to instructions stored in set-top box 131, the CPU of set-top box 131 connects user terminal 130-A to a selected Internet site (e.g., site 120-1) by receiving a selected channel number (e.g., "010") entered by a user through input device 133, reading the Internet address (e.g., "www.XYZN.com") associated with the selected channel number from the channel table memory, and transmitting the associated Internet address onto the Internet using the communication circuitry.

Since CPU of set-top box 131 in Nobakht connects user terminal 130-A to a selected Internet site, the data is processed on the terminal side in Nobakht, rather than the device side, and

Nobakht has no "Internet appliance (IA) terminal user management device . . . comprising: an IA terminal user storing unit storing IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection," as recited in claim 1. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

Claims 2-8 depend from claim 1 and add further distinguishing elements. Claims 2-8 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2-8 is also earnestly solicited.

Claims 9 and 10:

The second clause of claim 9 recites:

A transmission and receiving unit transmitting and receiving IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service to and from the IA terminal user management device which manages the IA terminal via the network, said IA terminal information representing registration information required for an Internet connection.

Nobakht neither teaches, discloses, nor suggests "a transmission and receiving unit transmitting and receiving IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service to and from the IA terminal user management device which manages the IA terminal via the network, said IA terminal information representing registration information required for an Internet connection," as discussed above with respect to the rejection of claim 1.

The fifth clause of claim 9 recites:

The IA terminal user management device judges whether or not the user registration information for the device has been written to the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device.

Nobakht neither teaches, discloses, nor suggests "the IA terminal user management

device judges whether or not the user registration information for the device has been written to the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device," as recited in claim 9. Claim 9 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 9 is earnestly solicited.

Claim 10 depends from claim 9 and adds further distinguishing elements. Claim 10 is thus believed to be allowable as well. Withdrawal of the rejection of claim 10 is earnestly solicited.

Claims 11 and 12:

The preamble and first clause of claim 11 recites:

A computer with which the IA terminal user management device managing the IA terminal connected via a network is provided realize:  
the function which stores, in a database, IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection.

Nobakht neither teaches, discloses, nor suggests a "computer with which the IA terminal user management device managing the IA terminal connected via a network is provided realize the function which stores, in a database, IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, user registration information including user information concerning the user who receives the service, said IA terminal information representing registration information required for an Internet connection," as discussed above with respect to the rejection of claim 1. Claim 11 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 11 is earnestly solicited.

Claim 12 depends from claim 11 and adds further distinguishing elements. Claim 12 is thus believed to be allowable as well. Withdrawal of the rejection of claim 12 is earnestly solicited.

Claims 13 and 14:

The second clause of claim 13 recites:

The function which transmits and receives IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service to and from the IA terminal user management device which manages the IA terminal via a network, said IA terminal information representing registration information required for an Internet connection.

Nobakht neither teaches, discloses, nor suggests a "function which transmits and receives IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, and user registration information including user information concerning the user who receives the service to and from the IA terminal user management device which manages the IA terminal via a network, said IA terminal information representing registration information required for an Internet connection," as discussed above with respect to the rejection of claim 1.

The fifth clause of claim 13 recites:

The IA terminal user management device judges whether or not the user registration information for the device has been written to the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device.

Nobakht neither teaches, discloses, nor suggests "the IA terminal user management device judges whether or not the user registration information for the device has been written to the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device," as recited in claim 13. Claim 13 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 13 is earnestly solicited.

Claim 14 depends from claim 13 and adds further distinguishing elements. Claim 14 is thus believed to be allowable as well. Withdrawal of the rejection of claim 14 is earnestly solicited.

Claims 15 and 16:

The preamble and third clause of claim 15 recites:

An Internet appliance user management device . . . comprising . . . transmission and receiving means for user management system transmitting and receiving the user registration information to and from the IA terminal, and requests the IA terminal to input the user registration information.

Nobakht neither teaches, discloses, nor suggests an "Internet appliance user management device . . . comprising . . . transmission and receiving means for user management system transmitting and receiving the user registration information to and from the IA terminal, and requests the IA terminal to input the user registration information," as discussed above with respect to the rejection of claim 1. Claim 15 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 15 is earnestly solicited.

Claim 16:

The preamble and first clause of claim 16 recites:

An IA terminal which performs information communication with an IA terminal user management device for managing the IA terminal via a network, comprising: transmission and receiving means for transmitting and receiving IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, user registration information including user information concerning the user who receives the service to and from the IA terminal user management device which manages the IA terminal via the network, said IA terminal information representing registration information required for an Internet connection.

Nobakht neither teaches, discloses, nor suggests an "IA terminal which performs information communication with an IA terminal user management device for managing the IA terminal via a network, comprising: transmission and receiving means for transmitting and receiving IA terminal information including an IA terminal identifier for identifying a number or mark of a manufacturer of the IA terminal, service information including the kind of service to be received, user registration information including user information concerning the user who receives the service to and from the IA terminal user management device which manages the IA terminal via the network, said IA terminal information representing registration information required for an Internet connection," as discussed above with respect to the rejection of claim 1.

The fifth clause of claim 16 recites:

The IA terminal user management device judges whether or not the user registration information for the device has been written to the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device.

Nobakht neither teaches, discloses, nor suggests "the IA terminal user management device judges whether or not the user registration information for the device has been written to



the user storing unit of the IA terminal before connecting the IA terminal to the IA terminal user management device," as recited in claim 16. Claim 16 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 16 is earnestly solicited.

Claim 17:

The preamble and third clause of claim 17 recites:

An Internet appliance (IA) terminal user management device which is connected to an IA terminal via a network, comprising . . . a transmission and receiving unit user management system, transmitting and receiving the user registration information to and from the IA terminal, and requests the IA terminal to input the user registration information.

Nobakht neither teaches, discloses, nor suggests an "Internet appliance (IA) terminal user management device which is connected to an IA terminal via a network, comprising . . . a transmission and receiving unit user management system, transmitting and receiving the user registration information to and from the IA terminal, and requests the IA terminal to input the user registration information," as discussed above with respect to the rejection of claim 1. Claim 17 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 17 is earnestly solicited.

**Conclusion:**

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-17 are allowable over the cited references. Allowance of all claims 1-17 and of this entire application is therefore respectfully requested.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

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If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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